

Section V:

On-the-Job Training



On-the-Job Expectations for Cooperative Education Programs

Every student needs to acquire at least a minimum level of competency from the on-the-job experience. On-the-job instruction shall be guided by the individual [training plan](#).

Based on the student's individual training plan, the student will:

1. Understand and follow safety practices and procedures specific to the work site
2. Demonstrate knowledge of terminology specific to the work site and career cluster/pathway
3. Acquire skills specific to the work site. Skills should correlate with industry-established standards
4. Apply related [SCANS](#) competencies and skills to the work site experience
<http://wdr.doleta.gov/SCANS/>
5. Demonstrate the ability to use tools and equipment specific to the work site
6. Gather, process, communicate, and apply technical information
7. Produce a product and/or perform a service

On-the Job Credit

Students shall receive one (1) credit per semester toward graduation for each nominal hour of classroom or laboratory instruction. At least two (2) credits per semester shall be earned via on-the-job training in a cooperative education program. ([511 IAC 8-2-Sec. 2-\(1\)](#))

Students shall be employed an average of not less than fifteen (15) hours per week during the school year. ([511 IAC 8-2-Sec. 5-\(6\)](#))

- Students participating in on-the-job training will earn academic credit upon working the minimum specified number of hours in the workplace, which is 540 hours per school year.
- One grade will be issued to include the related instruction and the on-the-job training. Weighting of this grade is at the school's discretion. Suggested grade distribution may be 50/50 or 1/3 related class and 2/3 on-the-job training.
- Students shall pass both the related instruction and the on-the-job training components in order to remain in the program and to earn credit.
- Students CANNOT receive credit for unpaid on-the-job training.
- On-the-job hours may be counted during periods of time when school is not in session (i.e., school vacations, holidays, and during the coordinator's extended contract) as long as the teacher/coordinator is on contract for supervisory purposes related to the cooperative education program at his/her respective schools.
- Students may not receive more than six credits for one full year, which includes the related instruction and the on-the-job training components. Students **may not** enroll in the same cooperative education program for a second year. For example, students may be enrolled in the ICE program for only one year. A student should not take two cooperative education programs during the same year. For example, students may not be enrolled in an ICE program and marketing cooperative education program at the same time.

- Regardless of the school schedule, students shall work 540 hours during the school year to receive credit.

Teacher Coordination Time

The teacher/coordinator must be given specified time to coordinate his/her students' cooperative education experiences. A school that endorses any form of on-the-job training without the proper teacher coordination time accepts liability for the student. Student liability issues should be a major consideration when assigning teacher coordination schedules and responsibilities.

Quality cooperative education opportunities cannot exist if effective coordination does not take place. Effective coordination means more than just visiting the students' work sites. It includes documentation of visits; preparing and reviewing training plans and agreements; communicating with parents, employers, administrators, and students; maintaining student records; visiting the work sites; and forming new partnerships with employers. To ensure quality in the coordination and administration of the cooperative education program, coordination time for the teacher must be provided using the following guidelines:

The teacher/coordinator shall have time scheduled for coordination activities during the same time students are released for on-the-job training. [\(511 IAC 8-2-Sec. 5-\(7\)\)](#)

The student-to-teacher ratio for the program is commensurate with the particular program area. (511 IAC 8-2-4 Program Requirements)

- The teacher coordination time should be blocked and scheduled when the businesses are in operation, when the student is on the job, and the employers are available to meet with the teacher/coordinator.
- A minimum of 10 hours of release time per week for up to 20 students is recommended based on the student-to-teacher ratio for the program. (511 IAC 8-2-4 Program Requirements) An additional 30 minutes per student per week of release time is expected for programs with over 20 students.
- The periods in the school day and the teacher's contractual agreement ultimately determine the number of students the teacher can coordinate. Based on release time expectations, a full-time coordinator could effectively coordinate a maximum of 40 students. A full-time coordinator is one who ONLY teaches cooperative education and is not assigned other classroom duties. Unencumbered time (no hall duty, lunch supervision, or homeroom) before and after the students' school day, as well as extended day contracts, can be utilized to meet coordination requirements.
- It is recommended that the teacher/coordinator has a 2-4 week extended contract to contact potential work sites, meet with students and parents, prepare [training agreements](#), develop [training plans](#), and meet with advisory committees.
- The teacher/coordinator should be paid travel expense at the current State or corporation rate for travel to and from site visits or the school corporation can provide a district vehicle.
- Program quality and student safety should always be priorities when scheduling adequate coordination time for cooperative education programs.

The teacher/coordinator shall use coordination time to complete the following activities:

- Visit businesses to select appropriate work sites
- Prepare [training agreements](#)
- Develop [training plans](#) with the assistance of the work site supervisor

- Develop new work site prospects
- Approve all work sites and match appropriate placements with student's career cluster/pathway
- Orient new work site supervisors
- Visit work sites 2 to 3 times per grading period to confer with training supervisors concerning student performance and progress
- Resolve any issues that may arise between the student and the work site supervisor
- Maintain student records
- Adjust training plans each grading period with the assistance of the work site coordinator
- Adjust student placements as needed
- Confer with parents/guardians, students, administrators, and work site supervisors
- Ensure that work site supervisors provide consistent, effective guidance and supervision in accordance with students' [training plans](#)
- Comply with local, state, and federal laws relating to cooperative education, safety, and employment of minors ([511 IAC 8-2-Sec. 5-\(3\)](#) and [511 IAC 8-2-Sec. 4-\(2\)](#))
- Visit work sites to observe students ([511 IAC 8-2-Sec. 5-\(7\)](#))
- Plan and attend advisory committee meetings
- Coordinate the planning of employer appreciation/student recognition events
- Conduct program evaluation surveys from current work site supervisors.
- Collect or explore employment data in the community to assist in expanding the scope of workplace experiences
- Conduct hazardous equipment surveys ([511 IAC 8-2-Sec. 5-\(2\)](#))
- Attend professional development conferences/workshops specific to CTE
- Attend community functions (Rotary, Kiwanis, Chamber of Commerce meetings, etc.)

Developing and Maintaining Work Sites

The teacher/coordinator is responsible for assisting in locating and developing relevant work sites. Both teacher/coordinators and employers must understand that the job is an integral part of the educational process and the school is not simply acting as a placement service for students desiring part-time work.

The teacher/coordinator should ensure careful selection of work sites, appropriate placements of students in jobs related to the student's chosen career cluster/pathway, and frequent and timely coordination visits. Work sites should be mutually approved by the teacher/coordinator and the student.

Effective on-the-job training should enable students to:

- Apply academic/career knowledge and skills at the work site
- Receive instruction on a variety of responsibilities, tasks, and skills related to the work site
- Gain experience in their chosen career cluster/pathway

The teacher/coordinator should ensure work sites provide a positive environment for on-the-job training and meet the requirements for providing a relevant placement. To avoid potential conflicts of interest, students should not be employed by a family business or be evaluated by a family member at a work site.

When the teacher/coordinator is locating potential work sites, he/she should:

- Consult the Dictionary of Occupational Titles and Occupational Outlook Handbook, <http://www.bls.gov/oco/home.htm>, for employment opportunities [\(511 IAC 8-2-Sec. 4-\(3\)\)](#)
- Reference the Indiana Department of Workforce Development for the current employment opportunities. <http://www.in.gov/dwd/2564.htm>
- Utilize the Internet, phone directory, and local paper to learn about new and established businesses in the community
- Consult with the [advisory committee](#)
- Contact established work sites
- Contact trade associations, professional organizations, civic organizations, and chambers of commerce
- Consult school administrators, counselors, and other school personnel
- Contact local employment offices
- Develop a database of appropriate work sites

Selecting Work Sites

The teacher/coordinator should ensure that potential work sites meet the following criteria:

- Conform to all local, state, and federal laws and regulations governing the workplace including equal opportunity provisions.
- Possess a reputation for integrity, ethical standards, and progressiveness in the community.
- Understand and be involved in appropriate activities linking the related instruction and the on-the-job experience.
- Understand the importance of the cooperative education program in the students' overall education.
- Provide an average of 15 hours per week of employment for the student for the entire school year.
- Work with the teacher/coordinator in planning and providing varied on-the-job learning experiences leading to the student's career cluster/pathway.
- Have a sincere interest in providing educational opportunities for students.
- Release students for program-related activities such as CTSOs.



Establishing Work Sites

The teacher/coordinator makes initial visits to potential work sites to assess their ability to meet the program criteria. A key responsibility of the teacher/coordinator is to prepare work site supervisors for their roles. Since working with students may be a new experience, work site supervisors will be much more effective when they are given special help by the teacher/coordinator. An orientation meeting is an effective way to explain the roles and responsibilities of work site supervisors.

The following information should be conveyed and discussed in person with potential supervisors:

- Purpose, goals, and benefits of cooperative education programs
- Brief overview of program operation
- Employment needs of the employer
- Role of the teacher/coordinator
- Expectations of the employer
- Procedures for student interviews
- Procedures for updating student training plans
- Procedures for student evaluation

Placing Students at Work Sites

The teacher/coordinator should interview all students to determine individual career cluster/pathways before placing them at a work site. If the work site supervisor is willing, the teacher/coordinator may arrange for student interviews. Ideally, several qualified students should be sent to interview at each potential work site. Employers will generally be more enthusiastic when they are given the opportunity to select from more than one student applicant. When this is not possible, the teacher/coordinator should explain this situation to the employer.

Once a student has been interviewed, a follow-up visit or call must be made to determine if the student will be placed. Once employed, the [training agreement](#) must be completed, the [training plan](#) developed, and where applicable a work permit filed for the student worker.

Students should not be encouraged to obtain their own jobs as a condition for admittance in cooperative education programs. Although this practice may reduce the workload of the teacher/coordinator, there are numerous negative consequences associated with student-secured work sites. A few of the drawbacks are:

- Employer lack of understanding of training responsibility
- Employer reluctance to cooperate in [training plan](#) design and student evaluation procedures
- Employer reluctance to adhere to school policies
- Diminished student commitment to program objectives
- Inappropriate placement in relation to student career cluster/pathway
- Reduced cooperation between the school and work site
- Reduced cooperation/interaction between the student and the teacher-coordinator

If students wish to enter the program with an existing job, the teacher/coordinator should follow the same guidelines for establishing a work site. This procedure eliminates potential drawbacks. In some cases, the teacher/coordinator may find that the work site does not meet the selection criteria based on the student's career cluster/pathway.

Site Visits

Effective coordination is essential to the success of the cooperative education program. The teacher/coordinator should conduct a minimum of two to three site visits per grading period, preferably when students are working and should include a conference with the work site supervisor whenever possible. In addition, the number and frequency of visits may be dictated by such factors as the seasons of the year, type of work site, location, and the number of students working at the work site. More frequent visits may be needed to monitor students experiencing problems. Records should be kept of all communication with employers and students.

During the site visit the teacher/coordinator should:

- Evaluate student performance as it relates to the [training plan](#) competencies
- Observe/evaluate student's competence, performance level, and attitude
- Confer with work site supervisors regarding student's strengths and areas for improvement
- Coordinate with work site supervisor to update [training plan](#) to ensure student growth
- Determine that on-the-job safety instruction has been completed and supplement with the [related class instruction](#) if necessary
- Discuss student evaluation with the work site supervisor
- Thank work site supervisors for their time and assistance and discuss future placements

Potential Problems to Anticipate at Work sites (See [Appendix B](#) for Frequently Asked Questions)

- | | |
|---|---|
| • Absenteeism/Tardiness | • Union strikes |
| • Misuse of breaks | • Discrimination |
| • Workplace visitors | • Sexual harassment |
| • Inability to accept correction/criticism | • Insecurity about doing a good job |
| • Difficulty in following directions | • Inadequate or poor quality production |
| • Misunderstanding benefits, wages, and/or hours worked | • Poor communication skills |
| • Lack of cooperation between student and/or work site supervisor | • Over confidence |
| • Unacceptable work site practices | • Irresponsibility or immaturity |
| • Seasonal jobs | • Lack of interest in job |
| • Company downsizing | • Theft |
| • Ethical Decisions | • Girlfriend, boyfriend, or family |
| | • Difficulty relating to co-workers |
| • Unacceptable cell phone use | |

Student Conferences

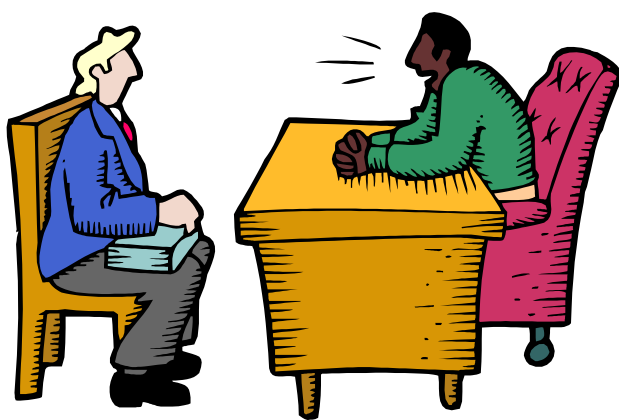
Student and teacher/coordinator conferences are essential for identifying instructional needs, sharing concerns, and solving problems. Conferences can be scheduled with students periodically throughout the grading period to discuss student progress and provide feedback from site visits. These should be done on a regular basis during the school year.

Job Changes and/or Termination

If an employer wishes to terminate the student's employment, the employer should first notify the teacher/coordinator. The teacher/coordinator shall meet with the work site supervisor to discuss possible options other than termination. If termination occurs, the teacher/coordinator shall complete a [termination notice](#), obtain signatures from all parties involved, notify the guidance department and employer, and keep the document in the student's file.

If the student is removed from the program because of termination by an employer, it is recommended that a "No Grade with No Credit" be given rather than fail the student for the year. At no time should the student be allowed to continue with the related class instruction.

Students should remain with the work site for an entire year. However, if a student has legitimate reasons for changing jobs, he/she must complete the [Request for Job Change Form](#) and then meet with the teacher/coordinator. The teacher/coordinator makes the final decision regarding job changes.



Documents/Forms for On-the-Job Training

Recommended documentation should include the following:

[Training Agreements](#)

The training agreement is a written statement of commitment from the work site supervisor, teacher/coordinator, student, and parent/guardian. Each party involved must sign the training agreement and each should keep a copy.

Training agreements should be signed before the student begins employment.

A training agreement explaining the essential features of the program and outlining the responsibilities of each party concerned is on file for each student in the teacher-coordinator's office. The training agreement shall be signed by the student, employer, parent, and teacher/coordinator. [\(511 IAC 8-2-Sec. 5-\(1\)\)](#).

[Training Plans](#)

The purpose of the training plan is to support classroom learning with on-the-job instruction and to serve as an evaluation tool. The teacher/coordinator and employer jointly prepare and regularly update the training plan to ensure student growth. The training plan includes learning experiences and performance competencies necessary to meet each student's chosen career cluster/pathway.

Occupational competencies may be found using various sources such as [Bridges](#), [O*Net](#), [Learn More Indiana](#), or [VTECS](#).

The training plan shall be signed by the student, employer, parent, and teacher/coordinator. [\(511 IAC 8-2-Sec. 5-\(2\)\)](#)

Training plans should be signed before the student begins employment.

Copies should be given to employers, students, and the teacher/coordinator. The completion of the training plan is the vital step in placing a student on the job. At the end of each grading period, the work site supervisor and the teacher/coordinator should review the plan, evaluate the student, and update the plan for the next grading period. Signatures shall be secured after all revisions.

[Evaluations](#)

Prior to the end of each grading period, the teacher/coordinator should make a work site visit for the purpose of having the work site supervisor evaluate the student's work experiences. This appointment should be scheduled so that all evaluations are completed and returned prior to the end of the grading period. This evaluation should be based on the goals, competencies, and instruction outlined in the [training plan](#). It is suggested that the teacher/coordinator arrange for evaluation conferences with the student, work site supervisor, and teacher/coordinator to assess the student's progress and performance.

Evaluations provide an additional opportunity for the work site supervisor to discuss ways the student can improve job performance. The teacher/coordinator is responsible for making sure each work site supervisor fully understands the evaluation process, the criteria, and the schedule for assessing student performance.

Evaluations will be used to determine the student's grade for the on-the-job training portion of the cooperative education program. Performance at the work site and the related class component are combined to determine the student's final grade. A copy of the evaluation shall be given to the work site supervisor and the student, and a copy shall be kept on file by the teacher/coordinator.

Weekly Work Reports

The student shall complete weekly work reports documenting hours worked in the previous week and complete an hours-scheduled form for the upcoming week. The teacher/coordinator should verify continued student employment by regularly checking the student's paycheck stubs or by weekly work reports signed by the employer. The teacher/coordinator should set weekly due dates for these forms to be turned in. It is imperative that the teacher/coordinator verify work hours to document that the student is meeting the average 15 hours per week at the work site. Students should not be given credit for hours worked if they were absent from school on that day. Students should not be allowed to work on days where they are absent from school.

Cumulative Hour Summaries

The teacher/coordinator is responsible for maintaining documentation of the total number of hours students have worked throughout the school year to monitor progress on completing the 540 hours required to receive credit. The teacher/coordinator may choose to have students maintain their work hours on a spreadsheet. However, it is still the teacher/coordinator's responsibility to verify the accuracy of the student reports.

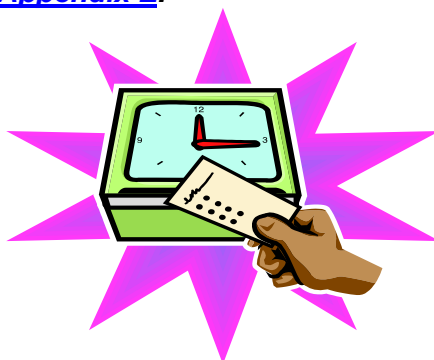
Students shall be employed an average of not less than fifteen (15) hours per week during the school year. Modifications will be considered for disadvantaged and handicapped students.
(511 IAC 8-2-Sec. 5-(6))

Students not meeting the minimum hour requirement cannot receive credit.

Site Visit Records

Written records of work site visits are important for maintaining accountability, continuity, and communication among students, parents, and administrators. Notes should be made regarding observations of the student, work site supervisor comments and suggestions, the progress a student is making at the work site, and problems that may have arisen. Additionally, notes of any phone conversations or other correspondence with work site supervisors and/or parents should be kept on file.

Sample forms are located in Appendix E.



Legal Issues

The teacher/coordinator shall obtain a copy of the most recent *Child Labor Laws: Guide for Issuing Officers and Employers* handbook from the Indiana Department of Labor or go to the following web sites for additional information:

Indiana Department of Labor
Bureau of Child Labor
402 W. Washington St., Room W195
Indianapolis, IN 46204
1 888 TEEN WORK
Indianapolis – 317.232-2655
<http://www.in.gov/dol/2761.htm>

U.S. Department of Labor, Wage & Hour Division
Indianapolis - Phone: 317.226-6801
South Bend - Phone: 574.236-8331
<http://www.dol.gov/dol/audience/aud-workers.htm>

State vs. Federal Law

For information on federal law contact the U.S. Department of Labor, Wage and Hour Division in Indianapolis.

If a conflict exists between state and federal laws, the higher standard or the one that offers the most protection for the minor governs employers and teachers/coordinators.

A printed “Notice of Teen Worker Hour Restrictions” must be posted at the work site if minors are employed. You may download the poster from the following web sites:

http://www.in.gov/faqs.htm?faq_id=17 or <http://www.in.gov/dol/2745.htm>

Minimum Age for Employment

Federal law stipulates that student-learners must be at least age 16.

www.dol.gov/esa/regs/compliance/whd/childlabor101.pdf

Child labor laws do not apply to domestic service, farm labor, or to service jobs such as newspaper carrier, golf caddy, actor or performer; therefore, children can work at these jobs at any age. <http://www.in.gov/dol/2761.htm>

Employment Certificates (or Work Permits)

Employment certificates are commonly referred to as “work permits.” Employers must secure an “Employment Certificate” before employing any minor less than 18 years of age. This form, Intention to Employ—State Form 896, is available at local high schools or online at <http://www.in.gov/dol/2745.htm>. This work permit must be kept on file at the place of employment and available for inspection as long as the student is employed and under the age of 18.

1. Secure an intent to employ from your school’s permit issuing officer or online
2. Fill it out, getting the necessary information and signatures from the employer and parent/guardian
3. Return it to the issuing officer, along with a copy of the student learner’s birth certificate

4. The issuing officer will issue the permit, which then is taken to the employer and placed on file until the worker quits, is terminated, or reaches the age of 18
5. In Indiana, student workers can hold multiple work permits as long as the hour restrictions are observed

Effective July 1, 2006, minors may hold more than one employment certificate (work permit) at a time. The issuing officer shall keep for each student who has been issued more than one employment certificate a record of the maximum number of hours that the student may work each week for all employers. If the number of hours exceeds the number of hours allowed by law, the issuing officer should contact the local Child Labor Inspector.

<http://www.in.gov/dol/2750.htm>

Minimum Wage and Overtime Pay

Employment of students in the program complies with all state and federal laws pertaining to the employment of youth including minimum wage regulations. [\(511 IAC 8-2-Sec. 5-\(3\)\)](#)

Wages are to be paid for the actual time the student is working. The student is to be paid for all work performed before the employment site officially opens, during work site hours, and after it closes. The fact that the work site is closed to the public does not alter this requirement.

Employers not covered by the Federal Minimum Wage Act will be covered by their state's minimum wage act. The state Department of Labor's Wage and Hour Office can provide guidelines. <http://www.in.gov/dol/2522.htm>

Breaks

Indiana law requires most Indiana employers to provide either one or two breaks (paid or unpaid) totaling 30 minutes to teens under the age of 18 who work six or more consecutive hours.

http://www.in.gov/dol/files/Child_Labor_Poster_2-8-08.pdf

Worker's Compensation Law

Minors enrolled in cooperative education programs are treated as adult workers. Therefore, they are not subject to the double compensation that other minors receive if injured while working in a prohibited occupation. This exemption applies only if *all* conditions for student employment outlined in the state's vocational education legislation are met. (511 IAC 8)

Sexual Harassment

Sexual harassment is a form of sex discrimination that violates Title VII of the Civil Rights Act of 1964.

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitutes sexual harassment when submission to or rejection of this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment.

Ultimately the employer should take the steps necessary to prevent sexual harassment from occurring. Employers should clearly communicate to employees that sexual harassment will not be tolerated. An effective complaint or grievance process should be established, with immediate and appropriate action taking place when an employee complains.

If students feel they have been sexually harassed, they should directly inform the harasser that the conduct is unwelcome and must stop. Students should use the employer complaint mechanism or grievance system available and notify the teacher-coordinator immediately. If necessary, students may file charges at any field office of the U.S. Equal Employment Opportunity Commission.

Health Issues

A health permit or food handler certificate may be necessary in order for students to work in occupations in which disease could be spread (food handling and health industry, for example). The application form can be obtained from the County Health Department or the Indiana Department of Public Health website.

Students participating in all clinical activities within a health science program are required to: (1) be trained in OSHA regulations, (2) understand the basic concepts of infectious disease, and (3) have the required immunizations (TB and Hepatitis). (Source: Memo from Jennifer Staley, May 2008, Health Career Specialist, Indiana Department of Education.)

Unemployment Benefits

The commitment between the work site and the school to train students exempts employers from paying unemployment benefits to students employed through cooperative CTE programs, even if the employer might be at fault for the student being fired. (Source: *Chapter 8, Section 3(k) of the Indiana Employment Security Act, and Regulation 514, Rules and Regulations of the Indiana Employment Security Board.*)

Affirmative Action

Students need to be aware of discriminatory practices and their rights but need to be cautioned to discuss these with teacher-coordinators before taking action.

Equal Employment Opportunities

If recommended procedures have been followed for developing work sites, most problems with discrimination should be eliminated. However, changes in supervisors often occur and some prejudices are not easily discovered. Therefore, teacher/coordinators and students need to be informed of Equal Employment Opportunity provisions. Check the Federal Equal Employment Opportunity questions and answers website, <http://www.eeoc.gov/facts/qanda.html> for the discriminatory practices, filing complaints, retribution, etc.

1. Discrimination in employment based on sex, race, color, religion, and national origin is forbidden.
2. Unequal pay and benefits for men and women who work in the same establishment and whose jobs require equal skill, effort, and responsibility is forbidden. Pay differences might be considered fair if based on seniority, merit, or quantity or quality of production. Jobs need to be substantially similar, not identical, to be covered by this.
3. Pregnant women have the same legal rights as other employees. If she can do the work, a woman cannot be denied employment or be forced to take a leave of absence.
4. No qualified person may be discriminated against because of physical or mental disability.
5. Claims of discrimination must be filed with the EEOC within 180 days of the incident. Employers will be informed within 10 days. If retaliation occurs, the EEOC will intervene and might even get a court order to stop retaliation.

Source: *Federal Equal Employment Opportunity (EEO)* <http://www.eeoc.gov/>

Family Leave and Medical Act

Since family leaves are designed for employees who have worked at least 1,250 hours and are employed for a year, and since students in cooperative education programs are assigned for temporary employment, this act does not apply to them. However, knowledge of its existence might prepare students for later employment situations.

Prohibited Occupations

Indiana law forbids employment of minors in occupations prohibited under the child labor provisions of the federal Fair Labor Standards Act. Check annually with the U.S. Department of Labor for restricted jobs and/or questions: <http://www.dol.gov>.

Cooperative Vocational Education programs are exempt from some restrictions that apply for other minors.

Restrictions on Hours and Days of Employment

Restrictions for minors 16 and 17 years of age must be followed. Check the Child Labor web page for current information: <http://www.in.gov/dol/2522.htm>.